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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 SONJA KLIMP, on behalf of herself and all) No. C 07-0203 CRB
18 others similarly situated,)
19 Plaintiff,) STIPULATION EXTENDING TIME
20 vs.) FOR DEFENDANT BEBE STORES,
21 BEBE STORES, INC.; and DOES 1 through) INC. TO RESPOND TO COMPLAINT
22 10, inclusive,) AND FOR EXTENDING DATE OF
23 Defendants.) INITIAL CASE MANAGEMENT
Complaint Filed: January 10, 2007

24 TO THIS HONORABLE COURT:

25 Plaintiff SONJA KLIMP (“Plaintiff”) and Defendant BEBE STORES, INC.
26 (hereinafter “Defendant”), jointly submit the following Stipulation to the Court for its
27 consideration and jointly submit the attached order extending the time for Defendant to

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1 respond to the Complaint filed by Plaintiff and also extending related case management
2 deadlines.

3 The background and circumstances which establish good cause for the extension are
4 as follows:

5 STIPULATION

6 WHEREAS, on January 10, 2007, Plaintiff filed the instant action against
7 Defendant;

8 WHEREAS, on March 8, 2007, this Court ordered that Defendant's time to file a
9 response to the Complaint was extended to on or before April 8, 2007;

10 WHEREAS, counsel for Defendant was recently retained and has not yet had the
11 opportunity to review and analyze the Complaint in order to determine the appropriate
12 response thereto;

13 WHEREAS, two nearly identical lawsuits pursuant to 15 U.S.C. § 1681 *et seq.* (the
14 Fair Credit Reporting Act), *Yalenkatian v. bebe Stores, Inc.*, Case No. 3:07-cv-00255, and
15 *Libman v. bebe Stores, Inc.*, 2:07-cv-00972, are pending in the U.S. District Courts for the
16 Northern and Central Districts respectively;

17 WHEREAS, the date to file a response to the complaint in *Libman v. bebe Stores,*
18 *Inc.* is May 7, 2007 and the parties to the *Yalenkatian v. bebe Stores, Inc.* action have
19 agreed to extend the date to file a response to the complaint to May 7, 2007 pending
20 approval of the Court;

21 WHEREAS, Plaintiff and Defendant agree that Defendant may have until May 7,
22 2007 to file a response to the Complaint in the above-captioned matter;

23 WHEREAS, by this Court's order, the Case Management Conference in this matter
24 is scheduled for April 20, 2007;

25 WHEREAS, Plaintiff and Defendant also believe that extending the Case
26 Management Conference date would promote efficiency;

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1 WHEREAS, Plaintiff and Defendant agree that the Case Management Conference
2 should be scheduled for June 1, 2007, or as soon thereafter as possible;

3 WHEREAS, Plaintiff and Defendant agree that the last day to meet and confer
4 regarding initial disclosures, early settlement, ADR process selection, and a discovery plan
5 and the last day to file a Joint ADR Certification with Stipulation to the ADR Process or a
6 Notice of Need for ADR Phone Conference should be no later twenty-one (21) days prior to
7 the Case Management Conference;

8 WHEREAS, Plaintiff and Defendant agree that the last day to complete initial
9 disclosures or state objection in a Rule 26(f) Report, file a Case Management Statement and
10 file and serve a Rule 26(f) Report should be no later than fourteen (14) days after the parties
11 have met and conferred regarding initial disclosures, early settlement, and a discovery plan.

12 WHEREAS, the parties recognize that this Court has the power to exercise
13 reasonable control over all proceedings connected with the litigation to ensure the orderly
14 and economic administration of justice;

15 WHEREAS, the parties further agree that the requested extension is not solely for
16 the purposes of delay, but so that the due process of the parties is protected and so that
17 justice may be done.

18 IT IS HEREBY STIPULATED BY THE PARTIES THROUGH THEIR
19 COUNSEL OF RECORD THAT:

20 Defendant *bebe Stores, Inc.* shall have up to and including May 7, 2007 in which to
21 file its response to Plaintiff Sonja Klimp's Complaint.

22 A joint case management statement will be due in the matter on or before May 25,
23 2007 and a Case Management Conference will be held on June 1, 2007.

24 The parties shall have up to and including May 11, 2007 in which to meet and
25 confer regarding initial disclosures, early settlement, ADR process selection, and a
26 discovery plan.

27 The parties shall have up to and including May 11, 2007 in which to file a Joint
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1 ADR Certification with Stipulation to the ADR Process or Notice of Need for ADR Phone
2 Conference.

3 The parties shall have up to and including May 25, 2007 in which to complete initial
4 disclosures or state an objection in a Rule 26(f) Report and to file/serve a Rule 26(f) Report.

5 Nothing herein shall serve as a waiver of any party's claims or defenses in this
6 matter.

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8 Dated: April 3, 2007

THE LINDE LAW FIRM

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IT IS SO ORDERED.

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STIPULATION EXTENDING TIME TO RESPOND TO COMPLAINT
AND FOR EXTENDING DATE OF INITIAL CASE MANAGEMENT
CONFERENCE AND [PROPOSED] ORDER; Case No. C 07-0203 CRB

